

AEC:mmt 05/09/18 1382

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

AMOS BALDWIN, et al.	)	CASE NO.:
	)	
Plaintiffs,	)	JUDGE
	)	
vs.	)	<b><u>NOTICE OF REMOVAL</u></b>
	)	
ALLSTATE FIRE AND CASUALTY	)	
INSURANCE COMPANY	)	
	)	
Defendant.	)	

All of the defendants hereby concur in the removal of this case to the U.S. District Court for the Northern District of Ohio, Eastern Division, from the Cuyahoga County Court of Common Pleas.

1. Defendant Allstate Fire and Casualty Insurance Company has been named as a defendant in a civil action filed in the court of common pleas for Cuyahoga County, Ohio, Case No. CV-18-895705. A copy of the complaint has been attached.

2. On April 11, 2018, the defendant first received a copy of the initial pleading setting forth the claim for relief. Thus, this notice of removal is timely.

4. Each plaintiff is an Ohio citizen whose residence or principal place of business is in the State of Ohio.

5. Defendant Allstate Fire and Casualty Insurance Company is a citizen of Illinois whose principal place of business is in Northbrook, Illinois.

6. The matter in controversy exceeds \$75,000, exclusive of interest and costs. The complaint states that the plaintiff is seeking unspecified compensatory damages in excess of \$25,000.00, plus punitive damages of \$1,000,000.00. Complaint at 5-6.

7. This court has jurisdiction over the subject matter of this action, under 28 U.S.C. §1332, based on diversity of citizenship.

WHEREFORE the defendant submits its notice of removal for this action from the Cuyahoga County Court of Common Pleas to this court.

Respectfully submitted,

CARR LAW OFFICE, LLC

By:

/s/ Adam E. Carr

Adam E. Carr (0062139)

Eric K. Grinnell (0089393)

Attorneys for Defendant Allstate

5824 Akron-Cleveland Rd., Ste. A

Hudson, OH 44236

(330) 655-1662 Telephone

(330) 653-5469 Facsimile

aecarr@carrlawohio.com

ekgrinnell@carrlawohio.com

**S E R V I C E**

A copy of the **Notice of Removal** has been served by the Clerk of the U.S. District Court for the Northern District of Ohio through the Court's electronic case management system, this 10<sup>th</sup> day of May 2018, to

Michael L. Eisner, Esq.  
Elk & Elk, LLP  
Landerhaven Corporation Center  
6105 Parkland Boulevard, Suite 200  
Mayfield Heights OH 44124

Attorney for Plaintiffs

Respectfully submitted,

CARR LAW OFFICE, LLC

By:

/s/ Adam E. Carr

Adam E. Carr (0062139)

Eric K. Grinnell (0089393)

Attorneys for Defendant Allstate